

Joseph Maldonado-Passage

May 25, 2018

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

BIG CAT RESCUE CORP.,)
A FLORIDA NOT-FOR-PROFIT)
CORPORATION,)

Plaintiff,)

-vs-

CIV-2016-0155-SLP

SHIRLEY M. SCHREIBVOGEL,)
AN INDIVIDUAL; AND)
GREATER WYNNEWOOD)
DEVELOPMENT GROUP, LLC,)

Defendants.)

DEPOSITION OF JOSEPH MALDONADO-PASSAGE
TAKEN ON BEHALF OF THE PLAINTIFF
ON MAY 25, 2018
IN OKLAHOMA CITY, OKLAHOMA

REPORTED BY: MARTA MATTINGLY, CSR, RMR

Joseph Maldonado-Passage

May 25, 2018

Page 48

1 Wynnewood Development Group as to why you are not
2 paying rent or lease on the main house that you live
3 in?

4 A No.

5 Q Not verbal or written?

6 A I work my ass off seven days a week.

7 Q But you are not employed by Greater
8 Wynnewood Development Group, are you?

9 A Nope.

10 Q You are employed by Greater Wynnewood Exotic
11 Animal Park.

12 A Correct.

13 MR. DUFFY: Object to form.

14 Q (By Mr. Givens) Is that right?

15 A Yes, sir.

16 Q Mr. Passage, why was Garold Wayne Zoo
17 dissolved?

18 A Broke.

19 Q When you say "broke," can we agree that that
20 means it was unable to pay its debts as they were
21 coming due?

22 A Correct.

23 MS. CHRISTIANS: Object to the form.

24 Q (By Mr. Givens) Was it making late payments
25 or skipping payments off and on up until the point

Joseph Maldonado-Passage

May 25, 2018

Page 49

1 where it dissolved?

2 A I think, if you look at the bank statements,
3 you would see that they pay more in overdraft fees
4 than they typically made.

5 Q Fair to say that the debts of Garold Wayne
6 Zoo were greater than its assets at the time it filed
7 to dissolve?

8 MS. CHRISTIANS: Object to the form.

9 MR. DUFFY: Object to the form.

10 THE WITNESS: I believe so.

11 Q (By Mr. Givens) Is that what you mean by
12 "broke"?

13 A Yes.

14 Q Did Garold Wayne Zoo keep a balance sheet,
15 Mr. Passage?

16 A Yes, sir.

17 Q And how was that balance sheet kept?

18 A I believe it was on the QuickBooks on a
19 computer that was sold with all the other stuff.

20 Q So any QuickBooks of Garold Wayne Zoo that
21 did exist at the park on a computer has long since
22 been disposed of?

23 A Yes, sir.

24 Q I hand you what was marked as Exhibit 7
25 previously, Mr. Passage. This document is titled,

Joseph Maldonado-Passage

May 25, 2018

Page 112

1 Q When is the first time you actually spoke
2 with him?

3 A I don't remember the date. But they were
4 moving from South Carolina to Colorado and he stopped
5 by and picked up a baby tiger to take to Serenity
6 Springs for me out there, is the first time I ever met
7 him.

8 Q You did meet him at that time?

9 A Yes.

10 Q Do you remember what month that was?

11 A No.

12 Q Do you think it was summer or fall?

13 MS. CHRISTIANS: Object to the form.

14 THE WITNESS: It was July, August, maybe.

15 Q (By Mr. Givens) Would there be any transfer
16 documents that we could look at that would nail that
17 timeframe down for us?

18 A No.

19 Q Why was the cub being sent out to Serenity
20 Springs?

21 A They needed a photo cub.

22 Q "They," being that park at -- the Serenity
23 Springs park?

24 A Yes.

25 Q Is that Nick Sculac?